

Note: Additional minor edits made by Sherry Foot, RAC Coordinator

NWX-DOI BUREAU OF LAND M

Moderator: Sherry Foot  
May 16, 2013  
2:15pm CT

RAC members in attendance : Frank White, Carl Albrecht, Bryan Harris, Lowell Braxton, Brian Merrill, Jim Allison, Steve Salter, Porter Teegarden, JR Nelson, John Harja, LuAnn Adams, Bill Hopkin

RAC members not in attendance: Steve Burr, Rick Ellis, Ted Zimmerman

BLM employees in attendance: Sherry Foot, Shelley Smith (DFO), Aaron Curtis, Cory Roegner, Sarah Schlanger, Bunny Sterin

Members of the public: Kitty Benzar (Western Slope No Fee Coalition), Norman Henderson (Private Citizen), Norman Pederson (Private Citizen), Noel Poe (Grand Staircase Escalante Partners), Cameron Witten (The Wilderness Society), Phil Hanceford (The Wilderness Society)

Sherry Foot Welcomed everyone. Call is being recorded for purposes of minute-taking. Went over ground rules. Stated that the public comment period will follow the business meeting.

Lowell Braxton (Chairman) welcomed everybody.

I think the only agenda item that we have this morning is a review of a sub-group- a RAC sub-group that is looking at suggested improvements to the BLM Utah National Landscape Conservation Program.

And Jim, you've chaired that sub-group and I'll just turn it over to you, but I want to thank you in advance and those members of your group that have put your shoulder to the wheel on this. I think you're off to a good start, from the sounds of it.

Jim Allison: I'm not sure how I want to proceed here. Everybody, I guess, has had- has seen the short summary I wrote up, although I assume for some members of the general public out there have - or the Wilderness Society folks presumably are interested in this and haven't seen it.

What's the best way to proceed here? We could read it.

Lowell Braxton: I would outline it if I were you and see what sort of questions come up out of that.

I would encourage anybody that participated with you on that to chime in and just kind of supplement what you're saying, if that's acceptable to you.

Jim Allison: Sure.

So the basic outline of what's happened here is in February, we created a sub-committee to review the draft National Landscape Conservation System strategy that the BLM had created.

The first thing we did was solicit written comments from members of the sub-committee. Got comments from Bill Hopkin, Porter Teegarden, J.R. Nelson, Steve Slater, Rick Ellis and myself in writing.

We had a conference call on the 24th of April to discuss the comments, the documents and so on. The conference call included not quite everyone who commented-Bill, Porter, Steve Slater, Rick Ellis and Steve Burr, along with me and some BLM people -- Bunny and Aaron and Sarah.

The transcript of the conference call ran to 100 and some pages. We had various written comments. I wrote a short document that summarized everything that we came up with.

I think the gist of it is that none of us liked the document very much. The document was really written for an internal BLM audience. I have some questions about how effective it was even for that audience, but it was sort of a first attempt to respond to direction from the National Office about creating a strategy, working within a set of themes and goals that the National NLCS strategy created. We spent a lot of time complaining about the document itself and suggesting improvements to it.

As far as the strategy itself, I think the way I characterize this in my summary -- and I think people can contradict me if I'm not getting this accurately -- but the RAC members that represented either conservation or recreation interests didn't really have a lot of problems with the strategy itself.

Phil, Rick and J.R. (in his written comments) seemed a little more worried about some aspects of the strategy. Basically, the folks who were more worried about agricultural production on public lands and so on were worried

about how it would affect those kinds of things and raised some questions about what parts of the strategy meant.

During the conference call, the BLM people were able to answer a lot of those questions about what the processes would be, for instance, excluding incompatible uses from NLCS lands.

At a very general level, that's where we are with the sub-committee, but our main recommendation is to go back and rewrite the document with an eye to releasing it to the general public and explaining all these things that members of the public have questions about.

Does anybody else want to weigh in?

Steve Slater: I think that's the gist of it. As far as the attempt to rewrite it for the general public, the biggest thing was the repeated mentioning of the values but not understanding what those values are, so defining that up front...

Lowell Braxton: Yes.

Steve Slater: ...so everyone understands what that means--not using all the acronyms, not just assuming everybody knows who these support or friends groups are and what they do and making it really clear to the general person what these actions look like and what values they're referencing back to.

That was the main thing. Maybe giving away some of the bullet system would help a lot with the issue. It's going to make a lot more work for those writing it, but it helps quite a bit.

Steve Slater: I was just reiterating some of the document as well-- just saying that I think re-writing it with a clear expression of what the values are up front.

They're referenced repeatedly throughout the document, but it's not really clear what those values are to the person reading them without perhaps going back to the national strategy itself.

The document should be standing alone and have those clearly defined as an introduction and then just writing so that the general person doesn't have to know what all the different acronyms are and who all the groups are and understanding those things.

Not even naming them specifically might be better than just saying, we're going to use citizen or support groups in this way. I think naming them specifically requires people to know who all these different groups are and assumes that's going to stay the same over time.

The last thing I had was just getting away from the bullets system that it's currently organized and writing it out more will help a bit with clarifying things.

Jim Allison: So what do we need to do here? Do we need to have a discussion? I think we're open for discussion from the RAC members, at least?

Lowell Braxton: Am I correct in remembering that Juan asked that we undertake this?

Jim Allison: Right.

Lowell Braxton: I'm not sure whether Juan articulated a schedule or an itinerary for completing this task or anything like that.

Sherry, are you aware of anything like that coming from him?

Sherry Foot: We do have a deadline to have our strategy completed. Aaron, do you remember the date?

Aaron Curtis: By the end of the fiscal year we need to have at least a game plan in place. That would be September 30th.

Lowell Braxton: So some sort of a revised document.

That should probably be the target to get that to Juan by September 1st? Is that unreasonable to give you folks this date to digest it?

Jim Allison: ...my sense of where we are with this is to have the RAC accept what I wrote as the position of the RAC and that would be fine with me.

The RAC needs to have whatever discussion we need and then just vote whether to accept or not accept this as the position of the RAC and the recommendation from the RAC to the BLM.

I have a couple of questions about how that ought to proceed. Should we go with my little four-page summary and attach the comments and the transcript, the written comments plus the transcript of the phone call and - as the official recommendation of the RAC, or should we do something entirely different? I don't think at this point that it makes much sense to go back and try and incorporate a whole bunch of specific comments to and tie them directly to the draft document like we did when we reviewed the roads IM.

It made sense in that case. It worked out relatively well. I don't see it - I see it being a ton of work that wouldn't be very productive in this case.

Brian Merrill: I didn't participate as part of the sub-committee, so I may be late to the game here. But I have the presentation we received. I've done a little more work studying the NLCS and even had an opportunity to comment on the National Policy to the House Resources committee.

My concern, specifically representing recreation, is that there is very little if any mention of recreation as a value that's managed for in here. That's partially because it's a problem from the national document.

The state document mirrors that document, but if there's an opportunity to put any comments in there about similar to the concerns that the agricultural folks had.

I think there needs to be as much specificity as possible about how they're going to work with existing/managing uses. I'm trying to get some change at the national level for including recreation as a value for which they should manage, along with conservation and science and all these other things they list.

Lowell Braxton: Comments from other RAC members?

Bill Hopkin: I might be premature here, and this was briefly brought up but not openly discussed. When I approach something like this and maybe this is not fair, but I try to think about what could this group provide to Juan that would be beneficial to him.

One of the things that disturbs me about this is cost and the lack of priority - prioritization of- so what's the most important thing. We've got limited amount of money, so what are the most important things that we- where we would spend that? What should come first?

You know, I obviously have an opinion that may not be shared, but I think it ought to be on those smaller areas that have incredibly high values like archaeological stuff that I think needs to be protected as we pursue to have more people come and see it.

Because of my opinion, I would de-emphasize wilderness and in general the monument, except for those areas of the monument that have those values.

All of us in our own households have a limited amount of resources. We have to spend it where we think we get the greatest value and, for example, if I was

stepping on to a million-acre ranch, the very first thing I would want to see is the budget and the financial report.

I can tell almost as much about what's happening on that ranch by looking at that budget as I can by going out and looking on the land, but then you have to go do that as well.

We're at a time of limited resources. I think that's important and I would love to see the budget for the Grand Staircase and for Red Cliffs and several of those that are quite diverse so that you can look at it and say, "Okay, this is where the money's going. Is this appropriate? Is this the best use of the money based on what the strategy of the NLCS?"

Lowell Braxton: Bill, if nobody buys your idea, what is the alternative strategy as you- as you see it, anyway?

Bill Hopkin: The alternative strategy is that the BLM will go ahead and make those decisions without any input from the RAC. Maybe they would anyway. We're only advisory. But, if we really reflect what the greater public is out there, then I think that's an important obligation we have, but maybe not.

John Harja: What do we expect to happen next, for example, if we were to say, "The report that Jim wrote represents a wide variety of views," which it does, and ask the BLM to rewrite the strategy to reflect those views as they fit and we look at it later? Is that something that we can do or should we just let them know that's what we think and good luck?

Lowell Braxton: If it were to be synthesized and rewritten and Juan would like us to be involved in it, I would think that's an appropriate thing for the RAC to do.

Jim Allison: To come b'ack to a rewritten document?

Bill Hopkin: Yes.

Jim Allison: Because I can say I don't really want to help rewrite it.

John Harja: I don't think we should, but I think that...

Lowell Braxton: Well, no. It probably wouldn't make sense.

John Harja: ...it'd probably make it a bit clearer. It makes it clearer of- there are different viewpoints. My viewpoint is that the BLM should stick to the origination document or law for each of the conservation units and do that. I think some

of the concepts in the draft drift off into other things other than what was directed for each of the units.

My idea would be we've given advice. Let's adopt it and ask the BLM to come back with a rewritten version. That's my view.

Bill Hopkin: What would be a reasonable amount of time?

Jim Allison: I think 30 days is reasonable.

Bill Hopkin: If we can't, because of sequestration, afford to meet again, we could do something similar to this and have another conference call.

Jim Allison: Correct.

Bill Hopkin: Does Bunny think 30 days is reasonable?

Bunny Sterin: Yes I do.

Jim Allison: Good. I assume you're going to do most of the writing.

Bunny Sterin: I will. I think 30 days or if we could go until the end of June, that would be probably the ideal.

Jim Allison: So bounce it back to the RAC or to the subcommittee?

Bill Hopkin: The entire RAC, because they will have taken into consideration the subcommittee's stuff.

Bunny Sterin: So would you be looking at--my deadline of June 21st and then get it back to you guys on the 24th?

RAC members concurred.

Lowell: It sounds like we've got a plan. Is there any other discussion from the RAC on that general plan, or do we close this agenda down now?

Jim Allison: Well I still have just as a procedural question is, do we need to either adopt my summary as RAC advice or maybe adopt it with the provision of making a couple of additions here from the comments we have?

Lowell Braxton: Is there a motion? Do we want to go to a motion system right now and vote on that? Is there a motion that somebody wants to propose on what you're saying, Jim, or somebody else?

Brian Merrill: I would make that motion.

Lowell Braxton: Okay

Brian Merrill: So the motion is that the RAC recommends to the BLM that they review what Jim's summary is here and other comments that have been made during this meeting to guide a rewriting of the document with a deadline of the 21st June.

Lowell Braxton: We have a motion.

Is there a second?

LuAnn Adams: Second.

Lowell Braxton: We have a second right now-- actually a couple of seconds. Discussion on that motion by the RAC?

Jim Allison: Just a question as the person in possession of the electronic copy of this document, therefore probably any changes that have to be made.

Are we suggesting that I incorporate -- because a couple of additional comments from Brian and Bill and John. Should I incorporate those into my summary?

Lowell Braxton: I would suggest that you incorporate the comments that have been made.

Jim Allison: So we'll take my summary.

I will add a couple of paragraphs to summarize these additional comments and then that will constitute the advice of the RAC?

Jim Allison: That's the motion? Okay.

Steve Slater: I would like to add just one more comment about some of the discussion we just had here. I recognize that of course it makes sense that various RAC members are representing the interests of who they represent, but I think it's just - to some degree we have to be sympathetic on the task due here, which is a separate system of land -- that it's not just the general management of the BLM lands, which is multi-purpose, which includes everything from grazing, mineral extraction, conservation values, recreation -- these have a mandate that is conservation, protection and restoration.



I don't know if we can necessarily expect them to come back with a document that looks just like we added everything back in-- management of the BLM lands as typical.

I just wanted to put that out there. I think it's understandable that these viewpoints are represented. Presidential orders for each of these pieces of land state how they are going to be managed and what type of activities are going to be allowed. I think we have to expect to see some of that in the document - some exclusion of some types of activities.

Lowell Braxton: I think that summarizes John Harja's comment. John, am I - am I correct on that?

John Harja: I think that's exactly what I was trying to say, is use the original

document. Lowell Braxton: Try not to invent something on the fly.

Brian Merrill: Yes. This NLCS management scheme is superimposed over some of the existing areas, isn't it? I mean, it's not just about newly designated areas.

John Harja: I would disagree. I think the system is composed of units. Each unit was created by either the president or by congress, and there are instructions given. My statement is simple -- you follow those instructions.

I think this document - this strategy - should reflect each of them and what the origination and instructions are.

Brian Merrill: Yes. I agree with that. I thought the comment was made that the NLCS only applied to anything that came up new going forward. But I think it does have the potential to countermand plans that are already in place. I agree with you. I think if there's already a plan working in an area, that you ought to stick with it.

Lowell Braxton: Is there comment from BLM on that? Shelley, can you help on that-- or Aaron -- with that specific question of how we address those framework documents and other things like that? Are we on point with sticking to the framework the way John Harja was suggesting and not expanding out of that?

Aaron Curtis: Absolutely. I think that John summarized it quite well. We have most BLM lands that are managed according to the Federal Land Policy Management Act, but these National Conservation Land units have either additional laws passed by congress or a presidential proclamation that we need to incorporate into those management schemes -- by law, that's our duty as an Executive branch agency.

I think a more thorough explanation of what our marching orders are for each of these different types of units -- whether it be according to the Wild and Scenic Rivers Act, according to the Wilderness Act-- the various things out there -- absolutely.

In terms of integrating future designations into our management plans, that's typically what we do at the next available planning opportunity. We incorporate all of that additional guidance into the plan. That's not to say an existing Resource Management plan is thrown out the window immediately. But at the same time, there's still another level of guidance that we have to make sure that we're considering.

John Harja: That raises a point. BLM is engaged in the planning process for the two conservation areas down near St. George. Those plans will govern how the areas are managed and everybody gets a plan - an opportunity to comment on that. What, then, is the purpose of this strategy document if each of the plans is truly the governing document?

Aaron Curtis: I think certainly there are some actions that we'll be completing those management plans which were required of us by the public law that designated them.

John Harja: What is the value that's added by this strategy document that we're discussing today? The rhetorical question I think you should just consider what we're actually doing by creating this strategy document.

Sarah Schlanger: I worked with Bunny and Aaron on developing the Utah strategy. As we've noted, it's tiered off of a national strategy that has four themes and essentially what we tried to do with the Utah document is show how we're going to address those themes in individual units and unit types in Utah. So how are we going to address the theme of ensuring a conservation protection restoration of national landscape conservation systems values in our wild and scenic rivers?

How are we going to do that at our national monument? How are we going to do that at the NCAs? We have identified projects and on the ground work and implementation actions that will meet the goals and the themes that are outlined in a national document. How that's going to happen on the ground in each of the individual unit types and in individual units themselves is identified in the actions that are a long appendix for the document that you all have seen.

So your question is, what does this add? This tells the public how we plan to meet the goals that are part of the four themes for a 15-year strategy nationally. We are showing how we are going to meet those goals over the next three years.

The details of what's going to happen in each unit are in the appendix and those details are implementation actions that meet the separate laws and proclamations and enabling legislation of each of the individual units and unit types.

So that's the connection. It's not a new management plan. It's how, under our existing management plans, we intend to address those four themes and their nested goals.

I hope that helps. Because that's the idea of this particular document--what will we be doing in the next three years in our units in Utah that address those four themes that were set nationally.

Bill Hopkin: I guess I'm a little, almost more confused. But the appendices at the end of this document that talks specifically about units within the NLCS are not the management plan for that NLCS, right?

Sarah Schlanger: No, they're not the management plan but they're actions that conform to those management plans. We're not proposing to do any particular action on a unit that would be out of conformance with the management plan or with the management plans that they're preparing for the national conservation areas either. Each of the units propose those actions based on the guidelines for managing their unit that comes out of their enabling legislation.

Bill Hopkin: So back to John's comment, how many of these units actually have a management plan in place that's approved?

Shelley Smith: Well, at some level, all of them have a management framework. The Grand Staircase has its specific management plan there. The NCAs are developing their particular management plans.

Bill Hopkin: Individually.

Shelley: Those are, yes. Then our wilderness study areas don't have individual plans for managing them but a lot of their management is already prescribed and where we do have some discretion, that's defined in our land use plans that surround and include those wilderness study areas.

Sarah Schlanger: All of them have management prescriptions already but none of them are to the level that this is. For example, "complete the Paria Canyon and

archeological inventory," that is of a level that would not be in a management plan.

The management plan goal may be broader to conduct periodic inventories. You know, understand better the resources of a place. The strategy is more particular - restore the roof and structural protection for Watson Cabin. You wouldn't find something of that specificity in a broader management plan. But all these particular actions support the broader management plan goals.

Bill Hopkin: Yes, I look at that as just the opposite. If I were, for example, BLM person with major responsibility for the Grand Staircase, I would want to have that management plan include the goals and objectives and the detail to get there within the management plan, not necessarily defined by a state strategy. Is that what you're kind of getting at, John?

John Harja: Yes it is. I am structurally looking at the need for this kind of document. I do think that the plans should be able to handle this and I understand BLM may be required to do this document but frankly, I don't see any value being added.

Given the sequestration, all these issues, I'm sort of questioning the need for it. I think you can, through the implementation plans of each of the monuments, each of the units, and the RMPs, there're a lot of implementation plans that are put together and I think those are the same things. So it begins to look to me like a duplicate effort, with all due respect.

Bill Hopkin: This may be unfair - how will you use this document if we created something that goes through the process and everybody's happy with it?

Aaron Curtis: From an internal perspective, I would anticipate that, obviously all of this stuff is going to be implemented as funding and staff is available. I think when we are trying to find funding sources for some of these projects that just being able to say that a particular project was identified in our statewide strategy, it could only help, you know, a project's competitiveness to get some funding from that perspective.

The other thing to think about is turnover. When we have new staff come in and they want to know all about what these conservation lands are all about, this is really kind of a roadmap for the direction that we want to go here in Utah.

That's going to be really useful. I do recognize and appreciate your comments on not being redundant here in our efforts, but I also think it is an important outreach tool for the public when they want to know what this is all about.

It does provide the opportunity to explain this is not the BLM trying to overreach on its conservation mandate. These are particular management requirements that congress and the president have mandated for us.

This is how we want to implement our marching orders. In terms of the explanation, our ultimate audience needs to be the public, so I do think that it will provide some value as an outreach tool as well.

Lowell: Well, hearing that, Jim, back to you and your subcommittee, does that change the direction that you would go in or is that still consistent with the motion -- I guess we're still discussing the motion.

Jim Allison: Yes, I don't know that it changes the direction. I still have some questions about the specifics of what we're moving to do but that's because I think I'm going to have to do it myself. I want to make sure we're clear.

What we're talking about is there's a document that's outreach to the public. It's also sort of some guidance to the BLM personnel about what activities, what actual things should happen. I think it's important to have that be clear and I'm still in favor of providing our advice, getting and seeing a rewritten document which is I think what the motion for us actually is.

We'll provide advice, we'll take a look at the document as rewritten in about a month, and then presumably provide more comments on the rewritten document as well. I think that still seems to me to be the best course of action.

Lowell: Thanks for that. Other comments from the subcommittee? Comments from the RAC at large?

Jim: I know this is stuff that probably no one else cares about but me, but I want to make sure that we have this very clear, so if I'm making changes to my summary document here, is the motion - does the motion before us just authorize me to do whatever I want in terms of adding these comments and nobody's going to- I mean, is it just giving me authority to do that? I don't know how else it works but I also feel a little uncomfortable just sort of running with it myself.

Lowell: I thought the motion included that, but you need to recognize that no good deed ever goes unpunished.

Jim: If it would be appropriate, as long as we're clear about it, everybody just says they're fine with me going ahead and doing this, they trust me to do it, I'll just do it. But one of the things I found writing this is I found it a lot harder to write it representing everybody than if I was just writing something advocating my own point of view.

I just want to make sure that it's what I see as the major comments that need to be incorporated. Brian Merrill wants to add something about recreation being more specific about managing existing uses.

Bill would like me to add some more, I think, about focusing on costs and prioritizing specific areas. And my sense is the way this ought to go is I'll just identify those as comments from specific members.

John Harja wants to make points about sticking to the foundation documents for each area and also I guess raise the question about doing this at the state level is even necessary and that we'd be better possibly unit by unit. Those are what I see as the major things that we would add, or that I would need to add.

Bill: Let me go back and see if I can blend something here because I really was kind of captured by what John was saying and I had felt the same way but it never solidified in my mind.

If you look at the document from the beginning to Page 18, those pages serve as a summary management strategy for all Utah NLCS lands and the appendices should provide the specifics for the individual units.

We weren't talking about the Grand Staircase or Red Cliffs. Toward the end of that document, we probably need to be really careful about what you put in as the appendix.

On these specific ones, maybe it is just simply what the enabling legislation or the president said so that you don't encumber the opportunity to make specific plans for those specific properties.

Aaron: Could you repeat the question?

Bill: Well, at the end, what we currently have are a bunch of appendices that talk about specific units within NLCS. In some ways, I think- and John, you correct me, but I'm not so sure that this document is that place for that. That should be the management plan for those specific ones.

And in this, maybe all it says about the specific ones, like the Grand Staircase, is what does the enabling legislation say about that as far as values and what, you know, has to be managed for?

The first 18 pages are just the guiding document. But these are the things that we're going to focus on in NLCS as a whole, which is kind of what they are.

Aaron: Sure. I think that what we also need to do here is rethink our approach a little bit because to me, I think a strategy document needs to be how we're going to do it.

(Delaney)'s plan says designate a trail system and the strategy should say how we're going to do that. Bring on some new conservation core crews to help us find the trail system. That's how and that's in line with what the national priorities are, to engage youth in the outdoors.

The on-the-ground actions-- we're making sure we're tying that back to a land use planning decision that approved that action to begin with.

This would give us a little bit more guidance. This planning decision is a top priority for us, so that's why we want to highlight this stuff, all the great stuff that we are doing on the ground.

Bill Hopkin: I'm sorry, I disagree. I think we've got a management plan for a property. You want what the goals, objectives and values that are clearly defined but the purpose for a management plan - this is why it's called the management plan - defines specifically what you're going to do to meet that goal and objective. It doesn't belong in here. It belongs in the management plan for the individual unit.

Aaron: Absolutely. But I think that the management plan, like Shelley was saying earlier, a lot of times, especially at the resource management planning level, when we're talking about over a million acres for a lot of these field offices, they're not getting into the how we're going to do it.

They're getting into just the action itself. What are we going to do? We're going to designate a trail system. Well, I think this is our opportunity to say how are we going to do that? We're going to be working with friends' groups, working with volunteers, with youth conservation crops and kind of- really kind of pitching our wagon onto the priorities that our national headquarters have provided for us.

Bill Hopkin: How will this document be used if you already have those marching orders somewhere else in the enabling legislation or the enabling framework language for a specific area?

Shelley: I think we use words differently sometimes, like, management. To us, a management plan is quite broad. It doesn't say build a red bam. It says here are some places where if you want to build something, it's okay to build them.

It's very broad scale. It's what we would term a very high altitude look at broadly used allocations. And then you tier that down to an implementation

plan. Well, what are you going to do first? How are you going to budget for it? What's its priority? We've done that with our land use plans. What Washington has said is we have four themes that we really want to emphasize for these national conservation lands and states how are you going to go about ensuring conservation protection and restoration?

How are you going to go about these other four themes? And then collectively as a state we're going to prioritize that. We may emphasize youth and that will affect all of our NLCS units but the goals and the parameters that are set out in these broad land use plans are what everything has to fit with. This plan is pretty particular. It's only four years into its focus. Our land use plans are hopefully living, breathing documents that have a 20-year life span, so it's sort of getting closer and closer to the ground with each phase of these plans to define more particularly how we're going to go about doing something. When we say management, we don't mean, like, management of a ranch. It's the broad term of a land use plan management. It's just broad allocations.

Bill Hopkin: So then how does BLM define a strategic plan? What does that mean?

Shelley: We had four strategies given to us by what we have to mirror from the national document. So our strategy is how do those themes play out in what Utah has which is different than what Colorado has and it's different than what Nevada has?

How are we going to implement these four strategies with what we've got-- our resources, our friend's groups, our volunteer arrangements, all of that? How are we going to go about doing these four broad themes on our national landscape (plans), observation (lands)? Did that make it better or worse?

Man: I'm having a tough time staying inside the discussion on the motion right now? Have we changed direction in this discussion to the point where we want to continue to talk this way but consider a substitute motion?

Aaron Curtis: I'm incredibly happy about this first round of feedback that you've provided us. I think the bottom line is we've got marching orders that this document needs to be done by the end of the year.

Man: But we don't have them officially.

Aaron Curtis: I'm really looking forward to advice on how we can improve this document.

Man: Give them (thesis).

Aaron Curtis: I do think that it's going to really make it a higher quality, more readable logical document that's going to be more audience appropriate. Let's see what



we wind up providing you with at the end of June, with the comments that you've already gone through and certainly we can convey to Juan that the RAC feels you'd like another go at looking at what the revision is.

I don't necessarily feel that I would come up with some substantive changes and the meaning but I think that the way that we're going to be communicating it is going to be much clearer. Maybe we can provide you with a revised draft and a lot of the answers to these questions that we're struggling with right now might answer themselves.

Steve: Aaron, it sounds like you mentioned that we were going to include a discussion of the purpose of this document and how it relates to the existing management plan, the existing national strategy and the discussion that we just had, will be really clear and the whole document will make more sense once you read it that way. But personally, I think the motion still holds weight.

Bill: Good, because we've all forgotten what it was.

Lowell: I don't know. I think you did a beautiful job. I haven't forgotten what it was. Jim, are you okay now? Is this helpful?

Jim Allison: Yes, I think I know how to proceed. I guess the one question I have remaining on the motion itself is when do I need to get this back because I do have 20 students in the field at this moment digging without me watching them...

Jim A. So if everybody's okay with me taking Memorial Day- to add half a page, is probably all I'm going to do- and I can try and get it done over the weekend but...

Sherry: I'll forward the transcript to you when I receive it.

Jim Allison: Okay, and I have notes which I think capture the essence of it but it would be good to look at the transcript, too. If everybody's okay with that, whatever- what is the day- the 28th is the day after Memorial Day.

Jim Allison: I think I can do it by then, though. I'll try and have my summary written and in on the 28th and I guess as far as the motion goes, I'm just going to go ahead and write it up as I see it and everybody's trust in me, right?

Man: With the caveat that we gave you already the inclusions that you mentioned.

Jim Allison: Right, and the one I didn't mention, which I think is just simply to ask for the chance to review the rewritten document. I'll add in there as well.

Lowell: If there's no further discussion on the motion, should we - have we captured that motion somewhere where we could restate it?

Bill Hopkin: I think basically it said that the idea was that the group, as a motion, was to accept the information that had already been summarized by Jim and add the additional discussions that we've had here this morning and then I'm not sure where it went from there.

Jim: I'll incorporate the additional comments that we discussed in the request to review the rewritten document. And then we'll submit that as the advice from the (RAC). That's how I understood it.

Lowell: With that bit of clarification, are we ready to vote on this?

Lowell: Sherry, can you bethvote taker here? All in favor of proceeding with that motion please say aye. (Note: Members' votes were all in favor)

Lowell: And I believe it was a yay unanimously in the room.

Lowell: That does make that a unanimous yay then. Thank you very much. Does this end this portion of the RAC meeting then? Well, once again, thanks Jim and your committee for getting us this far and Aaron. I think the clarification that we had earlier today is going to be very helpful when the draft document that Jim does as well as hopefully the final document will be that the BLM Utah can use.

Additional comments from the RAC? Hearing none, I think this brings us to the time of this meeting where we can accept public comment. I have five people that have indicated they are representing the public.

What I'd like to do is give each party that wants to speak, about five minutes to comment. And hopefully we'll only have one representative from each of those various organizations, although, I might accept as many as two from an organization but we do need to move this forward. So shall I just start with Phil Hanceford from the Wilderness Society. Do you have comments that you want to make?

Phil Hanceford: Sure. I'll be brief. Thank you for recognizing me and I'll just say I am on as a Wilderness Society representative but also full disclosure, I sit on the Monument Advisory Committee for the Staircase as well as the environmental representative and really appreciate you guys and the RAC and the subgroups' discussion today and your previous meetings on this.

We got an update at the Monument Advisory Committee meeting just last week in Escalante on this and as well as your comments but we just got kind

of a bulleted point version of your comments that I guess that you just approved, Jim's summary.

So it would be helpful for me - I don't know if Steve Burr, he's kind of our liaison, is on the line - but he can pass on your recommendations to the MAC because we're also considering this document and going to making individual comments on the strategy.

So that would be one comment. If we could get a copy of those that four-page recommendation and however Jim captures the discussion here today.

More broadly, I have had a chance to look through the strategy. Generally support the document as a strategy document which is meant to be representative of as somebody said how we actually get there.

I deal with a lot of land use plans and four NLCS units and they are those 20-year some of them even longer looking out 20 years and very broad goals and objectives and they don't get into the specifics.

So I appreciate the discussion today about some of the individual action items for units. I don't think those belong in the RMPs, the Resource Management Plans, but in implementation plans and I think what is nice to see in the strategy is you have the broader goals of the national strategy turning down to Utah and then down to individual actions within a three-year time zone.

So it's actually items that are achievable. Whether they are or not as Bill or somebody said, with the budget constraints and sequester and that kind of thing might be an issue but just for the planning purposes and a strategy it's the way it's supposed to work.

You have the broader RMP goals and objectives on down to action items and individual unit items. It makes sense to me in that sense, so I do think is on the right target.

As far as the need for it, I do think it helps. I've seen a couple of other California and Colorado. I've seen some other strategies coming out in draft form as well and compare that to this one. They are different.

Each state has different priorities, different units. Some don't have monuments, others have more wilderness area or whatnot. So the focus changes. The groups that can help implement the conservation and restoration projects on the land change from state to state.

So I think it is needed to implement the national strategies. I actually think it's clearer, if you look at the national strategy on down that beyond does not intend to over-reach here.

So I'll just -- in my comments with that again, would love to see your recommendations as they come out to help inform our recommendations on the Monument Advisory Committee and appreciate the discussion. Thank you.

Lowell: Thanks very much Phil. The next name I've got on the list is Noel Poe.

Noel Poe: To introduce myself briefly I'm the president of the Grand Staircase Escalante partners which is a friends group for the national monument.

I appreciate being able to listen to the RAC discussion this morning particularly about the strategy that is laid out for each of the individual units of the national conservation lands.

You gave me something a little different to think about as I was listening to that discussion. But what I see is this is a strategy plan carrying on similar to what Mr. Hanceford said is that it does lay out some specific actions that is of value to us as partners for the national monument.

I can give you just one example. As our board reviewed the draft strategies they were looking down and we went into a lengthy discussion of where we could raise money to help the national monument meet some of the strategies that they put in this plan.

One example that I'll mention. We have an archeological site stewardship program and because of sequestration we lost the BLM challenge cost share grant that would have gone to funding that for another year or a little over a year.

So now we're looking at going out to private donors or private foundations to get money to continue this program. If we can point to a document such as the three-year strategy plan that the state of Utah has, then that helps us sell our need any donors or foundations.

I'm hopeful that this is important enough to a lot of the people out there that will be able to find those funds as we go into 2013.

I mention because I'm a little proud of it as our organization but in 2013 we have raised over \$550,000 almost \$575,000 in private funds to help the monument with conservation, primarily conservation projects that they want us to do.

So we had been somewhat successful and I think we got some by using this document we'll be able to generate some more money. Now at the same time I must add we'll be putting our comments together because we see some weaknesses in the document and we'll be directing that to the state office.

I think I'll just end there and thank you for the chance to comment.

Lowell: Thank you very much. I have a Cameron Witten with the Wilderness Society. Do you have additional comments that you'd like to make?

Hearing none, Kitty Benzar, West Slope Coalition.

Kitty Benzar: Yes, I'm commenting along with Norm Henderson today about the letter that we both signed that you guys should have gotten earlier in the week and I think I'd like to let Norm lead off our comment and then I'll chime in after he's done with anything I have to add if that's all right with you.

Lowell: That sounds fine. Norm, take a shot at it. Again, let's try to summarize in five minutes if you can do it.

Norm Henderson: Okay I'll give it a shot. Thanks very much for the opportunity to address the committee today with my concern. I guess our concerns about the previous recommendation to the Secretary (Interior) to move forward with a couple of key proposals by BLM for the San Juan River and the Red Cliffs.

We're asking the committee today to consider or reconsider its recommendation to the secretary to move forward with those fee plans.

In essence, we believe that the previous recommendations to the Secretary to be invalid and since they appear to have been made with less than a full understanding of the concerns of the public about the underlying business plan and without that understanding it seems hard to understand how the committee could make an informed recommendation to the Secretary.

The recommendations were made outside the scope of its authority as specified in the RAC charter. BLM failed to provide you guys with significant issues about the underlying business plans and management programs under the guise that they were irrelevant to the field fee proposal itself.

Therefore, you've got a presentation about the fee proposals, sort of a shortened version about the only the issues it appears that BLM thought were relevant to the fee proposal itself and not to the underlying business plan or management program.

We disagree with this assessment and ask you to consider our argument. We believe that the integrity of the underlying management programs described in the business plan complement of any fee increase request.

In fact, the BLM asked specifically for the public to comment on the underlying business plan when it was developed. So it seemed appropriate that you be given the full understanding of the public input on the actual fee underlying business plan.

We believe also that by recommending the fee program to the Secretary that you were in essence sanctioning these underlying management programs which we believe to be flawed.

So why do we feel these programs were flawed? First and foremost the environmental compliance on the entire - I'm speak here primarily of the San Juan River program- but under the primary problem with that is that the environmental compliance for the entire river program has not been completed.

The Monticello RMP, which identifies the river program for BLM and has significant environmental compliance attached to it, addressed only public lands. So the National Park Service portion of the program and potentially the Navajo lands portion of the program were not addressed at all.

Therefore, significant resources that are now incorporated in the business plan because the business plan speaks of a program - and this was brought to you at the meeting - the program that was brought to you was for 102 miles of river and that includes the National Park Service lands, it includes the beyond lands and potentially it includes the Navajo nation lands.

Within those Park Service lands that are now incorporated or officially incorporated in the program are some prime resource values relating to wilderness, and wild and scenic status and critical habitat for endangered species, none of which received- because they were in the National Park Service- they never received any environmental compliance for the program.

Let's see, so you were unaware that these key features were there and they had not been evaluated by the current program. Also there's bighorn sheep lambing grounds on the Navajo side of the river along the river corridor that were not brought to your attention or were not evaluated in the environmental compliance through NEPA.

The environmental compliance also includes the National Historic Preservation Act compliance and ESA compliance none of which has been

done on the National Park Service or Navajo lands that are now incorporated into the overall river program as defined in the business plan.

Secondly, the underlying business plans purports not to be a management but in essence it actually is. It modifies staffing levels in the business plan, it proposes and prioritizes construction projects. It talked about a change in focus of the overall management program.

It implements that management program that has never been really defined except in the Monticello RMP which is very general and doesn't include the National Park Service lands.

These changes that are purported in the business plan should help your regular BLM on a land use planning processes such as a resource management plan. And again, these are the things that we're bringing up now. These are the things that were brought up early on in the process when the BLM asked for input on the business plan.

None of this was brought to your attention during the presentations that were made in February so that you could make a recommendation. So it's hard for us to understand how you were able to certify or document the general public support for the recommendation was there when you did not hear everything about the public input on the proposal.

And lastly, on this category is the Red Cliffs Recreation Area, the business plan proposes to radically change the boundaries of the Red Cliffs Recreation Area. This again this is not something normally done through a business plan.

In fact, by BLM regulation changing the boundaries like this is reserved for management, it's for resource management plans themselves. You were not told that the BLM is in the middle right now of a planning process for Red Cliffs Conservation Area.

They're developing an EIS and a full fledged management plan where the boundary changes would be most appropriately considered where all the different to put it in context all the other factors and concerns that are going to be going on within the conservation area, that's where it's most appropriate for these change in boundaries to be considered.

And again, this was not brought to your attention. In our way of thinking it's difficult to see how you could have made the recommendation to the Secretary on a fee proposal that was adjusting- the underlying premise of this was adjust boundaries in a business plan that wasn't looking at all the different factors that a resource management plan would have.

And then finally, authority of the RAC is very clear in the charter and I assume the Secretary was very careful in how gave the authority to the RAC on how it was to conduct its business.

First of all, the RAC is specifically chartered to make recommendations to the Secretary for activities on public lands and of course the program as described in the business plan is for a program that extends onto National Park Service lands.

So in essence you were making a recommendation - at least the way we see it - outside the confines of the charter. And then secondly the charter restricts the committee to making recommendations for only standard and expanded amenity fees.

The permit, the San Juan River permit is not either one of those. It's a special recreation area permit fee. So in both those cases the RAC appears to be operating outside its charter.

Now there's a good chance that it-- well, first of all this charter that you're operating under now has been recertified by the Secretary I think two or three times since it was first put into place probably back in 2006 or '07 it's hard to understand that this is not the intention of the Secretary.

But even if that were the case it would seem before a valid vote could be taken that the charter needs to be modified to allow the RAC to make such a recommendation to the Secretary.

So putting all this together what we're asking you to do is to take another look at this recommendation at the next meeting and see whether you would reconsider the vote and I guess I would say do it the right way with all the information and see whether you would still want to propose this to the Secretary. Thanks.

Lowell: Thank you. Was there another commenter that wanted to parallel with you?

Kitty Benzar: That would be me, Kitty Benzar.

Lowell: Please proceed.

Kitty Benzar: I won't take much time. I'd like to hear what you all think about what (Norm) said. I just want to say that I concur with everything he mentioned. The whole process to me was very deeply flawed. The BLM says they want public input and then does a very superficial job of soliciting that and then even despite that when they get some they treat it dismissively.



So again I don't think you were given the full picture of the concerns that the public brought forward. They were thoughtful, they were substantive, there were serious problems with assumptions, and with law and with policy. Yet they were treated and summarized at your meeting for you in a very superficial and potentially incomplete way.

So I just concur with Norm's request that at your next meeting that you take another look at that and I would like to hear what you all think about what we wrote and what we said.

Lowell: We didn't get any public comments from you reflecting what you've just told us at the time that we held that fee meeting as I recall.

Kitty Benzar: Our comments, both Norm's and mine were in the record.

Norm Henderson: The contention we're making is that the comments that we had made through the 30-day comment period to BLM should have been properly summarized by BLM and brought forward to you.

They did summarize comments- that's true- but they seem to have left out all the - what we consider to be - some of the most important ones which related to the underlying management programs such as the

Lowell: I can't speak for the BLM but that's not part of the RAC's charter to go back and review the basic management of the lands. We're here to hear and make decisions on the fees themselves and I think you're probably trying to expand the role of the RAC beyond something that I as a RAC chairman feel we have.

There are plenty of administrative opportunities for you to appeal BLM actions but I'm not sure we can expand the RAC's jurisdiction to be an appeal board. So I guess my position is we probably acted within our charter and I don't see that we have an opportunity to appeal that, to re-visit that on appeal.

I would encourage you - if you feel that you need to - to work with the administrative side of BLM. There may be appeal opportunities that will meet your needs but I don't believe this RAC is the place to do that.

Norm Henderson: With all due respect, I mean I'm not trying to challenge your assessment there really but I'm just trying to understand how it's not relevant to the RAC to understand whether a program is potentially even legal or not.

I mean if they don't have that information then technically by your assessment there if brings it to you even though it's fatally flawed then you have nothing to say about it. Then you potentially could make a recommendation on that.

So I guess I'm sort of perplexed how not looking at anything with regard to the underlying program is not relevant.

Lowell: Go ahead Jim.

Jim Allison: Well at least to comment. We did discuss some aspects of this during our meeting but they were out of the scope of any of our decision-making as I think we understood it.

We didn't approve any business plans. We didn't approve any boundary changes for Red Cliffs but we certainly were aware that NPS lands were involved and that Red Cliffs were involved.

Jim Allison: In fact I think I specifically asked whether we needed to do something about the boundary change at Red Cliffs and the answer was no, that's not our job.

All we did and all we had the authority to do was to say -- was to look at the proposed fee increases and determine whether they seemed reasonable relative to the uses of going out on the river, the needs to deal with the amenities.

It may well be - I'm perfectly willing to believe that there's something wrong with the business plan. I haven't looked at it closely myself but I just don't see that we didn't approve the business plan. It's not our job and we can't-- I mean we don't have any authority to go back and revise it.

I guess maybe as the RAC we can ask the BLM to take another look. But we certainly have no authority other than advisory.

Kitty Benzar: I would like to just say that the business plans in both cases are the documents that were taken to the public and the public was asked to comment on them. And the public comment that was received was substantial and significant and your requirement under FLREA is that there be documentation of general public support before you forward a recommendation to the secretary.

Lowell: Only for the fee increase, right? Not for the business plan.

Kitty Benzar: So the business plan is what the public commented on and so to me it's hard to separate the two. The comments that came in from the public demonstrated generally a lack of public- general public support were on all aspects of the business plan.

Some of them were about the fees and some of them were about other aspects. But the business plan in both cases was the document on which public

comment was solicited and it was that public comment that you were supposed to document prior to making a recommendation.

Lowell: Thank you for that. Are there any other members of the RAC that would like to speak to this?

Brian Merrill: Yes I think there is a distinction here. As I read through those public comments, you're right some of them are about the specifics of the business plan and there may be questions about whether it over-reaches and gets into areas that ought to be addressed in the resource management plan but our duty was simply to give a recommendation on the fees portion.

As you read through the public comments on the fees portion there mixed comments and I don't think that we -- while it says there should be general public support there was general public support. There was also general public opposition but our task is to look at all those and make our recommendation based on our thoughts as well.

It wasn't a vote where we were going to get in and say okay 18 people were opposed and 17 were in favor therefore we're going to say no. There were plenty of comments in there in favor of the fee increase even and plenty of mixed comments where they said yeah we think the fees are okay but then they raised some of the other issues you did.

Our task was merely to make a recommendation on fees and that's what we did. And I think you're asking us to do the very thing that you're complaining about is to make recommendations or comments on the management of the resource when that's outside the scope of our authority or it was in this case.

Lowell: Thank you for that. Additional comments from the RAC?

Carl Albrecht: I'll just say to these folks that I appreciate their comments but going along with what Brian said our task was to address the fee proposal only. There are a lot of processes, there are a lot of appeals processes that are available to them if they feel they need to pursue it further.

Lowell: Anybody else from the RAC? Well I think the comments that we just heard from the RAC members and the ones that I made I think are a good summary of the RAC's authority on this and I believe I'm not hearing any support for continued action on the part of the RAC.

I think it's been stated quite well that there are other opportunities on the administrative matters through the BLM and I would encourage you to go in that direction if you feel that you need to.

But I think that closes the RAC's review of this issue. Thanks again for your comments.

Are there other issues on the part of the public that should be raised at this point?

Hearing that I think this concludes the RAC meeting for today. I want to thank everybOdy for their participation and I look forward to meeting with you again some time in the future.

Shelley: On behalf of our state director I also want to extend our thanks and appreciation to the dedication you all bring to your task. It's truly valued.

Sherry: Thank you members and we will chat probably on the 24th of June so I will make sure that a federal register notice is issued and published within the designated time frame. Thank you again everyone and we'll chat next month.

END

Approved:

  
\_\_\_\_\_  
Lowell Braxton, RAC Chairman

Dated:

\_\_\_\_\_6/17-13